

INTRODUCTION

Wisconsin's plan is designed with the purposes of the Temporary Assistance for Needy Families (TANF) block grant, described under Section 401 of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), as its foundation. Wisconsin's TANF program seeks to provide the necessary employment and training services, including supportive services and financial incentives, for low-income parents to obtain permanent and stable employment with access to further training that will lead to career advancement.

The Wisconsin Works (W-2) program, from its inception, has been designed to assist eligible individuals in connecting to the workforce. The primary principle of the W-2 program is that individuals and their families can best achieve self sufficiency through employment. As the W-2 program has matured over the last nine years, W-2 has become more closely focused on strategies that effectively connect low income individuals to the workforce and how best to promote economic self-sufficiency by helping individuals secure and retain jobs and advance in the workforce.

Effective July 1, 2008 the responsibility for the TANF program was transferred from the Department of Workforce Development (DWD) to the newly created Department of Children and Families (DCF). Also, several TANF programs were transferred to the new DCF from the Department of Health and Family Services (DHFS), which was renamed the Department of Health Services (DHS). To account for this change in administration, the names of the original departments and the current departments are both listed effective July 1, 2008. For example, a program originally in DWD but now in DCF becomes DWD/DCF and a program originally in DHFS but now in DCF becomes DHFS/DCF. If not otherwise stated, DWD/DCF administers the programs in this plan. Changes to websites referenced in this document were done concurrent to the reorganizations.

Effective with the creation of the new department, some of the Segregated State Programs or Separate State Programs (SSP) have been categorized differently and additional existing state programs have been added that qualify for TANF maintenance of effort (MOE) for FFY2009. Changes and new programs are identified in narratives of those programs. However, for purposes of this plan, each program is grouped in the FFY2009 categories and explanations given to show, when different, how grouped for FFY2006-FFY2008.

GENERAL PROVISION ASSURANCES

Under the TANF plan, with the exception of Safety Services and Child Welfare Prevention Services, Wisconsin will provide services to needy families at or under 250 percent of the Federal Poverty Level (FPL) with the level of services provided varying according to income and assets as outlined in the plan. For those programs that fall under the fourth purpose of the TANF program (i.e., Encourage the formation and maintenance of two-parent families), there are no income limits in place for those funded with 100% federal funds and for those that promote Healthy Marriage or Responsible Fatherhood.

The State ensures the following:

1. Wisconsin's TANF program is designed to serve all political subdivisions in the State (not necessarily in a uniform manner), provide assistance and services to needy families with (or expecting) children, and provide parents with job preparation, work and support services to enable them to leave the program and become self-sufficient.

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2. The program will require a parent or caretaker receiving assistance to engage in work (as defined by the State) once the State determines that the parent or caretaker is able to engage in work, or once the parent or caretaker has received assistance under the program for 24 months (whether or not consecutive), whichever is earlier.
3. Parents and caretakers receiving assistance under the program shall be engaged in work activities in accordance with section 407.
4. Reasonable steps shall be taken to restrict the use and disclosure of information about individuals and families receiving assistance under the program attributable to funds provided by the federal government. Chapter 49 of Wisconsin State Statutes details the restrictions on disclosure of information for Wisconsin's TANF programs.
5. In order to meet the third purpose of TANF as identified in section 260.20(c) of 45 CFR, Part 260, the following goals have been established and action has been taken to prevent and reduce the incidence of out-of-wedlock pregnancies, with special emphasis on teenage pregnancies, and numerical goals have been established for reducing the illegitimacy ratio of the State.
 - Wisconsin provides funding for projects to address adolescent pregnancy prevention, adolescent parent self-sufficiency, pregnancy counseling and adolescent parenting skills. Based on results from currently funded programs and initiatives, DHFS/DHS in coordination with DWD/DCF developed the following dual strategies, consistent with the State Public Health plan, Healthy Wisconsin 2010 Plan, for addressing adolescent pregnancy prevention by:
 - Encouraging and promoting delayed sexual activity; and
 - Providing access to confidential contraceptive and related reproductive health services to prevent unintended pregnancy among sexually active adolescents.
 - The current goals of the plan by 2010 are: 30 percent or less of Wisconsin high school youth report having had sexual intercourse (reduced from 39% in 2001 to 30% in 2010); and reduced unintended teen pregnancies by 30 percent by promoting youth to consistently choose and correctly use contraceptives and barriers from 76% in 2001 to 87% in 2010.
 - The Adolescent Pregnancy Prevention Committee (APPC) is one of Wisconsin's mechanisms for achieving the goal of reduced adolescent pregnancy. The Committee is co-chaired by DWD/DCF and DHFS/DHS and works in partnership with the Wisconsin Department of Public Instruction and a broad range of public and private provider agencies and stakeholders from around the state in the areas of teen pregnancy prevention, abstinence education, and HIV/STD intervention.
 - The APPC supports abstinence for Wisconsin youth and the specific goal of addressing birth outcome disparities. High risk youth involved in the child welfare system are a priority. Abstinence programming also includes peer education in high schools, education and support of professionals and other adults involved in children's lives, and training of educators, including educators in all tribal health centers on the use of an abstinence curriculum developed by Native Americans. Abstinence for youth also is advocated through program collaboration with the City of Milwaukee Health Department,

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the state Department of Public Instruction, and STD/HIV/Family Planning workgroups. The link to the Wisconsin Abstinence website can be found at <http://dhs.wisconsin.gov/teenpregnancy/appc/index.htm> (formerly www.dhfs.state.wi.us/waiy/).

- APPC also has developed a statewide Wisconsin Adolescent sexual health Listserv for adolescent reproductive health practitioners and partners; hosted statewide educational teleconferences and youth listening sessions, and developed a new Wisconsin Youth Sexual Behavior and Outcomes Data Website which summarizes data about Wisconsin teenager sexual behavior and abstinence, STDs and births. The link to the Data Website can be found at <http://dhs.wisconsin.gov/stats/s-beyouth.htm> (formerly <http://dhfs.wisconsin.gov/state.s-behyouth.htm>).
- Although minor parents living outside of an adult supervised living arrangement are not eligible to receive cash assistance under W-2, W-2 agencies have been directed by DWD/DCF to put special emphasis on providing case management services to minor parents, regardless of their income, assets, or living arrangement. All minor parents are eligible to meet with a Financial and Employment Planner (FEP) and receive W-2 case management services. Case management may include discussions on family planning, money and time-management, career planning, and parenting and independent living skills. The FEP may also provide a minor parent with information regarding available child care services, high school and school-to-work preparation, community resources, and eligibility for food stamps, other food and nutrition programs and Medicaid. Eligibility determination for these other programs will be completed according to individual program eligibility rules.
- W-2, through its policies, encourages both parents to delay having additional children until the family is more financially secure. There are several ways the W-2 program encourages the prevention and reduction of the incidence of out-of-wedlock pregnancies for the adult population served by W-2: 1) Flat grants: Like employment, W-2 provides cash payments based on participation, not family size. If an individual fails to participate, his or her payment is reduced by \$5.15 per hour. 2) Family cap: W-2 does treat parents who have additional children while on assistance differently. Parents caring for a child under 12 weeks old may be eligible to receive, as a "short term, non-recurrent benefit," a stipend to cover their living expenses that does not carry a work requirement. However, parents receiving such payments are exempt from time limits only if the child is born less than ten months after the individual was first determined eligible for W-2 (or if the birth was the result of sexual assault or incest). 3) Case management: FEPs may counsel participants to delay subsequent births or provide referrals to family planning services.
- As part of the Case Management Training Series, Wisconsin is providing a participant guide on Employment-Focused Family Planning. The base of information developed will continue to be utilized in W-2 to assist participants in making choices about their career and family, encourage the use of resources available to them and make appropriate referrals based on their needs. Each W-2 agency maintains a list of family planning referral agencies and health care providers which is available to all customers.
- The Wisconsin Family Planning Waiver is a Medicaid program for women between the ages of 15 and 44 whose income does not exceed 185% of the poverty level. It covers selected family planning services, including free contraceptive services and supplies,

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initial family planning office visits, and tests and treatment for sexually transmitted diseases. The program is administered by DHFS/DHS.

- As defined by the federal government in section 403(a)(2)(C)(iii) of the Social Security Act, Wisconsin's illegitimacy ratio was 0.4 in 2000 and 0.5 in 2005. The source of this data is DHFS/DHS, Division of Public Health, Bureau of Health Information and Policy, Wisconsin Interactive Statistics on Health (WISH) data query system. The website can be found at <http://dhs.wisconsin.gov/wish/> (formerly at <http://dhfs.wisconsin.gov/wish/>). The Birth Counts Module was accessed on 10/19/06 to obtain this data.

DHFS/DHS developed an Implementation Plan Summary titled *Healthiest Wisconsin 2010* in conjunction with the Healthy Wisconsin 2010 Plan referred to earlier under the first dot point in number 5. Wisconsin does not use the term "illegitimacy ratio" in its State Health Plan, but does establish a goal of reducing unintended pregnancies as an outcome objective connected to the broader health priority of reducing high-risk sexual behavior. The goal established for reducing unintended pregnancies in Wisconsin as stated in *Healthiest Wisconsin 2010* is that 30 percent or less of pregnancies to Wisconsin residents will be unintended by 2010. *Healthiest Wisconsin 2010* website can be found at to <http://dhs.wisconsin.gov/statehealthplan/hw2010/index.htm> (formerly <http://dhfs.wisconsin.gov/statehealthplan/Implementation/pdf-files/summary.pdf>).

6. A number of state and local initiatives are under way in Wisconsin to address the problem of statutory rape so that teenage pregnancy prevention programs are expanded in scope to include men. Examples of these efforts include:

- The "Real Men Respect" campaign, a public relations campaign intended to prevent sexual assault and promote healthy teen relationships. This campaign is led by DHFS/DHS in partnership with the Wisconsin Coalition Against Sexual Assault. The campaign is targeted toward 13-17 year olds; with a primary focus on boys.
- Training and in-services to educators through the Department of Public Instruction on the topic of reporting requirements for sexually active adolescents.
- A video series called *Sexuality Attitudes and Awareness* is used to educate individuals on the legal issues and consequences of violating child sexual assault laws. The program is used with individuals who may benefit from the information as determined by the courts, a district attorney or a probation and parole officer.
- The Wisconsin State Legislature passed a law in 2001 that requires Child Protective Services (CPS) Agencies to refer all cases of suspected or threatened child sexual abuse to law enforcement. In turn, the law enforcement agency and CPS must coordinate the planning and execution of the investigation of the report. Any law enforcement agency that determines that criminal action is necessary must refer the case to the District Attorney for criminal prosecution. DHFS/DHS has developed a CPS standard that describes requirements and guidelines for collaborating with law enforcement agencies in reports of sexual abuse as well as reports of other forms of child maltreatment.

PUBLIC INPUT

Through the Wisconsin biennial budget process; the Legislature's Joint Finance Committee meetings and other public forums, there is ongoing public dialogue regarding the Wisconsin TANF program. DWD publicized the availability of the draft Federal Fiscal Year (FFY) 2006-FFY 2007 TANF Plan as a means of soliciting comments from the public.

Simultaneous to submitting the draft TANF Plan to the U.S. Department of Health and Human Services, DWD placed an announcement on its public website homepage regarding the availability of the draft Plan for public comment. The web link included the draft Plan and instructions for submitting comments and the timeframe for submitting them. In December 2005 and January 2006, DWD mailed out information regarding the availability of the draft Plan on the Department's website and the process for submitting comments on the draft Plan. Information about how to obtain a hard-copy of the draft Plan also was provided. The information was sent to numerous groups and individuals, including W-2 agencies, Division of Workforce Solutions (DWS) Area Administrators and Regional Administrators, child care coordinators, child support agencies, directors of county departments of human services and social services, tribal economic support directors and the Great Lakes Intertribal Council.

Written comments on the draft Plan were accepted by DWD for consideration over a time period of forty-five days and it reviewed all comments for potential changes to the draft Plan.

DWD also conducted a public hearing during the public comment period, and no additional comments were received at the hearing.

After the conclusion of the public comment period, DWD revised this Plan to include the following summary about the number of comments received, the types of comments received, and the changes made to the draft Plan as a result of the comments.

DWD received comments from five organizations. Only a few comments suggested Plan revisions and it revised the Plan language based on these comments, which focused on sex education and adolescent pregnancy prevention.

FEDERAL TANF AND CO-MINGLED PROGRAMS

W-2 PROGRAM DELIVERY SYSTEM

DWD/DCF has taken a number of steps to improve operation of the W-2 program focused on better outcomes for families. Chief among the improvements for the 2006-09 W-2 contract cycle are changes for the delivery of services in Milwaukee County, where the largest population of the state's caseload resides. The service delivery changes separate W-2 functions: case management for employment and training; job development; and case management for Supplemental Security Income/Social Security Disability Income (SSI/SSDI) eligibility. Different entities specializing in the delivery of certain W-2 services are designed to produce better outcomes for participants and stronger connections to employers.

DWD/DCF's direction for the 2006-09 W-2 program focuses on:

- Assisting W-2 program participants in successfully making what might be their initial connection to employment;
- Ensuring that participants strengthen connections to employment, short term training opportunities and career ladders;
- Providing employment stabilization services that ensure employment retention and rapid reattachment to employment if employment is lost;
- Providing assistance in obtaining federal SSI and/or SSDI for those participants who, even with possible disability accommodations for severe and multiple disabilities, are more appropriate for SSI/SSDI than employment;
- Performance standards focusing on successful participant outcomes in obtaining and retaining employment, enrollment in relevant job skills training, and eligibility for SSI/SSDI where appropriate;
- Emphasis on connections to local employers to expand job opportunities for W-2 participants that offer a career ladder and the availability of short-term customized training to make W-2 participants more ready for employment;
- Focus on job retention strategies to assure that when W-2 participants find a job, they are able to keep a job or quickly become re-employed if they lose the first job;
- Emphasis on providing workforce connection services in conjunction with the Wisconsin Job Centers and other workforce development programs, including close cooperation with the area Workforce Development Board; and
- Integration of service delivery methods with other family support systems, such as community support programs and child welfare programs, to better serve participants facing multiple challenges.

DWD/DCF encourages W-2 programs to provide services that are strengths-based, family-centered and respectful of participants' interests and goals. Building on the strengths and skills of individuals and families in assigned W-2 activities facilitates successful outcomes for families.

In addition to providing training and supportive services to the custodial parent(s) in the W-2 group, there are initiatives within Wisconsin's TANF program that seek to promote personal responsibility and career development among other family members. For example, non-custodial parents are offered work training and supportive services through the Children First program, empowering them to meet their children's as well as their own financial needs.

W-2 Program Access

W-2 agencies were awarded W-2 contracts for the period January 1, 2004, through December 31, 2005. There are currently 47 W-2 Agencies in 76 W-2 areas of the state. The agencies include a combination of public and private agencies, selected through a competitive process and Right of First Selection.

Twenty-two W-2 Areas are Operated by Six Private Non-Profit Agencies

Forward Services Corporation Bay Area Consortium – Brown*, Florence; Kewaunee; Menominee*

Forward Services Corporation Northern Consortium – Forest; Langlade; Lincoln; Oneida; Vilas

Forward Services Corporation - Waushara

Shawano County Job Center – Shawano

UMOS - Milwaukee County Regions 2 and 4**

YWCA of Greater Milwaukee - Milwaukee County Region 1**

WOW-WDB – Ozaukee; Washington

Workforce Connections Inc. Consortium – Jackson; Juneau; Monroe;

Workforce Connections Inc. Columbia

Workforce Connections Inc. – Pierce; St. Croix

Four W-2 Areas are Operated by Three Private For-Profit Agencies

ACS - Waukesha

Kaiser Group, Inc. - Walworth

MAXIMUS, Inc. - Milwaukee County Regions 5 and 6**

Fifty W-2 Areas are Operated by County Agencies

Thirty-eight W-2 agencies are county human/social services agencies including six county consortium acting on behalf of twelve additional county human/social services agencies.*

* Brown was added to the *Forward Services Corporation Bay Area Consortium* and was deleted from the County Agencies effective May 2005.

** Changes in Milwaukee County Regional structure resulted in the elimination of one region and transitioned *Opportunities Industrialization Center of Greater Milwaukee* W-2 operations to UMOS, MAXIMUS and the YWCA in early 2005.

Eight Tribes developed a TANF plan and are working directly with the federal government: In addition to the seven Tribes previously working directly with the federal government: Red Cliff, Stockbridge-Munsee, Potawatomi, Sokaogon, Lac du Flambeau, Oneida and Bad River, Menominee Tribe developed a TANF plan and is working directly with the federal government effective April 2004.

All W-2 agencies are either collocated or electronically linked to Job Centers in each W-2 geographic area. Job Centers provide one-stop shopping for employers to meet workforce needs and for job seekers to obtain career planning, job placement and advancement, and training at the local level. Job Centers are open to all job seekers, including W-2 participants. The W-2 Contracts for 2006-09 were increased from a two-year period for the 2004-05 contracts to a four-year-period in effect January 1, 2006 through December 31, 2009.

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For the period January 1, 2006, through December 31, 2009, the following W-2 agencies were awarded W-2 contracts. There are 44 W-2 Agencies in 82 W-2 areas of the state.*** The agencies include a combination of public and private agencies, selected through a competitive process and Right of First Selection.

Effective January 1, 2006, Twenty-seven W-2 Areas are Operated by Six Private Non-Profit Agencies

Forward Services Corporation Bay Area Consortium – Brown, Florence; Kewaunee; Menominee

Forward Services Corporation - Northern Consortium – Forest; Oneida; Vilas; Langlade; Lincoln

Forward Services Corporation – Waushara

Workforce Connections Inc. Consortium – Western Consortium – Jackson; Juneau; Monroe; Trempealeau

Workforce Connections Inc. Columbia

Workforce Connections Inc. – Pierce; St. Croix

Workforce Connections Inc. - Douglas

UMOS - Milwaukee County Case Management Agency (CMA) Central and Southeast Regions and Milwaukee County Job Development and Placement Agency (JDPA) Central and Southeast Regions and Supplemental Security Income (SSI/Social Security Disability Income (SSDI) Advocacy Agency county-wide

YWCA of Greater Milwaukee - Milwaukee County Case Management Agency (CMA) Northeast Region

Shawano County Job Center – Shawano

Workforce Resource Inc. - Barron and Chippewa

Effective January 1, 2006, Nine W-2 Areas are Operated by Four Private For-Profit Agencies

Arbor Employment and Training (E&T) - Ozaukee; Washington; Waukesha

Kaiser Group, Inc. - Walworth

MAXIMUS, Inc. - Milwaukee County Case Management Agency (CMA) Northwest and Southwest Regions and Milwaukee County Job Development and Placement Agency (JDPA) Southwest Region

Policy Studies, Inc. – Milwaukee County Job Development and Placement Agency (JDPA) Northeast and Northwest Regions

Effective January 1, 2006, Forty-six W-2 Areas are Operated by County Agencies

Effective January 1, 2006, thirty-three W-2 agencies are county human/social services agencies including seven county consortia acting on behalf of thirteen additional county human/social services agencies.

*** Effective January 1, 2006, the five Milwaukee W-2 regions operate as 11 W-2 functional areas: five Case Management Agency functions; five Job Development and Placement Agency functions; and one county-wide Supplemental Security Income (SSI)/Social Security Disability Income (SSDI) Advocacy Agency function.

Financial and Employment Planner (FEP) Role

The FEP is central to W-2 integrated case management and is the primary individual who performs and/or monitors all case management services for the W-2 participant. This approach allows a simplified process for the participating family and is more likely to help build a supportive relationship between the participant and the FEP.

A FEP provides:

- W-2 eligibility determination
- W-2 employment position placement
- Employability Plan (EP) development
- Case management
- Referrals to the child support agency
- All other support services for a participant in a W-2 employment or work training position

Supportive Services Planner (SSP) Role

An applicant may decide to request only supportive services. If the applicant/participant is not eligible for, or does not request a W-2 employment position, the Supportive Services Planner (SSP) determines eligibility and provides for the delivery of services which may include:

- | | |
|------------------------|---|
| - FoodShare* | - transportation assistance |
| - Medicaid/BadgerCare | - child care |
| - Emergency Assistance | - referrals to the child support agency |

*FoodShare is Wisconsin's name for the federal SNAP (Supplemental Nutrition Assistance Program), previously known as Food Stamps.

W-2 ELIGIBILITY

The primary purpose of W-2 is to prepare eligible parents for unsubsidized employment to help them provide for their families and become self-sufficient members of the community in which they live. There are four categories of individuals who may be eligible for services of the W-2 program:

- Custodial parents of minor children may access all W-2 services.
- Non-custodial parents, subject to a support order for a child, may receive case management services.
- Pregnant women, with no other born children living with them, may receive case management services.
- All minor parents are eligible to receive W-2 case management services.

The objective criteria used by Wisconsin to ensure fair and equitable treatment of all individuals seeking W-2 services can be found in the W-2 Manual at <http://dcf.wisconsin.gov/w2/manual/default.htm> (formerly http://dwd.wisconsin.gov/dws/manuals/w-2_manual/default.htm).

Applicants must meet both non-financial and financial eligibility criteria to be considered for a W-2 employment position, a Job Access Loan and certain case management services. In addition to the criteria set forth in the W-2 Manual, each W-2 agency is required to have on file with the

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Department of Workforce Development a Civil Rights Compliance (CRC) Plan that assures that the population to be served in the geographic area under each contract within the State is provided equal access to W-2 services. The requirements and format for the CRC Plans can be found at http://dcf.wisconsin.gov/civil_rights/plans_instructions.htm (formerly http://www.dwd.state.wi.us/dws/civil_rights/plans_instructions.htm).

Income Limits

The W-2 group's income must be at or below 115 percent of the federal poverty level.

Asset Limits

The W-2 group's assets cannot exceed \$2,500, excluding the combined equity value of vehicles up to \$10,000 and one home that serves as the homestead.

Cooperation with Child Support

Applicants and participants must cooperate with child support enforcement efforts to be eligible for W-2 services. The determination of whether an applicant is cooperating with child support enforcement efforts is made by the child support agency. An applicant or participant may claim good cause for refusal to cooperate at any time during the application process or once found eligible for W-2 services. It is the W-2 agency's responsibility to make a determination of good cause in each case.

Residency Requirement

W-2 applicants must verify that they are currently residents of Wisconsin. With the exception of migrant workers, W-2 applicants must also demonstrate an intent to continue to reside in the state.

TANF assistance received by an adult in Wisconsin or any other state counts toward the 60-month time limit. When there is evidence that an applicant has received cash assistance in another state, the FEP must:

1. Determine the number of months TANF cash assistance was received in the other state by contacting the appropriate persons;
2. Take steps to ensure that the cash assistance received was, in fact, TANF cash assistance; and
3. Document that information in the case file for future calculation of eligibility.

The W-2 policy manual provides resource information to the FEPs on how to contact other states to verify if TANF benefits were received.

Accessing Other Sources of Income

A W-2 applicant may be required to apply for and accept other public assistance programs or resources that may be available, prior to being determined eligible for W-2 services. Applicants who refuse to cooperate are not eligible for a W-2 employment position or a Job Access Loan.

Temporary Absence of a Minor Child

Consistent with the options provided for states in US Code Title 43, Chapter 7, Subchapter IV, Part A, section 608, DWD/DCF rules allows W-2 agencies to provide W-2 services to an otherwise eligible family for up to three months when the minor child has been or is expected to be absent from the home for a period of 90 consecutive days. Effective January 1, 2006, DWD/DCF exercised its authority to establish good cause exceptions which allows, on a case by case basis, an extension of the temporary absence timeframe to up to 180 days.

W-2 PROGRAM TIME LIMITS

60-Month Time-Limited W-2 Payment Policy

Both federal TANF and state W-2 legislation include a 60-month lifetime limit for eligibility. The time-limits were first applied to AFDC recipients participating in the Job Opportunities and Basic Skills (JOBS) program beginning on October 1, 1996. W-2 agencies may extend the time-limits on a case-by-case basis because of circumstances including:

1. The adult W-2 group member is unable to work because of personal disability or incapacitation;
2. The adult W-2 group member has significant limitations to employment;
3. The adult W-2 group member is needed in the home to care for another severely incapacitated group member; or
4. The adult group member has made all appropriate efforts to find work, and is unable to find unsubsidized employment because local labor market conditions preclude a reasonable job opportunity.

24-Month Time Limit for Subsidized Employment Positions

Participation in any W-2 employment and training position category (Trial Job, Community Service Job (CSJ), and W-2 Transition (W-2T)) is limited to 24 cumulative months. Extensions to the time limits may be granted on a case-by-case basis.

W-2 EMPLOYMENT AND WORK TRAINING FOR CUSTODIAL PARENTS

W-2's goal is to connect parents with appropriate work or work training as soon as possible. This is done by immediate placement in a W-2 employment or work training level:

- Unsubsidized Employment
- Trial Jobs
- CSJs
- W-2T

A participant enters the highest possible employment or work training level according to ability and is expected to move up to the next appropriate level at the earliest opportunity. Each new placement brings with it increased income and greater family self-sufficiency.

Unsubsidized Employment

Unsubsidized employment is the highest and most desirable level in this employment or work training system. The FEP must first consider unsubsidized employment for any W-2 applicant who has a strong employment history and skills. Individuals may be placed at this level if they are working in unsubsidized employment and do not have barriers to full-time employment, or they are unemployed, but have been assessed as having the capability of obtaining immediate full-time employment. There are no W-2 cash payments for individuals placed at this level and case management services are provided on a voluntary basis.

Case management services for employed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing guidance in career decision making skills;
- Exploring career options;
- Identifying vocational opportunities;
- Researching training information;
- Creating or updating a resume;
- Developing networking skills;
- Providing referrals to other community resources; and
- Providing job survival/retention techniques.

Case management services for unemployed individuals placed in Unsubsidized Employment include, but are not limited to:

- Providing assistance in creating a financial plan;
- Establishing employment goals;
- Providing information about job openings;
- Improving job interview skills;
- Completing job applications;
- Writing a resume;
- Arranging job interviews with employers; and
- Contacting employers on the individual's behalf.

Follow-Up Case Management Services

Participants who progress from a subsidized employment position to an unsubsidized position receive follow-up case management services for at least 6 months to support job retention. W-2 agencies may provide follow-up case management services beyond the mandatory 6-month period regardless of the individual's income and asset levels.

The case management services may include:

- Employment skills training;
- English-as-a-Second Language classes if the W-2 agency determines that the course will facilitate the individual's efforts to retain employment;
- A course of study meeting the standards for the granting of a declaration of equivalency of high school graduation; or
- Other remedial education courses.

Wisconsin encourages W-2 agencies to provide services beyond the 6-month period to prevent recidivism and ensure employment stability. There is no time limit on these services.

Effective January 1, 2006, DWD/DCF requires W-2 agencies to provide follow-up case management services for a minimum of twelve (12) months.

Subsidized Employment and Work Training

If good faith attempts to obtain employment have been unsuccessful, or if the W-2 agency determines that an applicant is not prepared for unsubsidized employment, the applicant may be offered a W-2 work training placement. Individuals placed in one of the three W-2 work training placements, Trial Jobs, CSJs or W-2T, may be required to continue appropriate ongoing employment search with the assistance of the W-2 agency, while participating in a W-2 work training placement.

Trial Jobs

Trial Jobs are W-2 subsidized work training placements, intended to encourage employers to give permanent opportunities to individuals who appear job ready, but have a weak work history. The W-2 agency contracts with the employer and pays the employer a subsidy (up to \$300 per month) with the expectation that if the W-2 participant performs satisfactorily, the employer will offer that participant permanent employment. The wage subsidy to the employer may be used flexibly at the Trial Job employer's discretion for training, transportation, or as an offset to employment costs.

An individual may participate in a Trial Job for a maximum of three months with an opportunity for a three-month extension in the rare instances where the additional time is needed to assure job readiness. The total number of months an individual may participate at the Trial Job level is 24 months. The Trial Job employer must pay at least the minimum federal or state wage per hour and must pay wages and benefits comparable to those received by regular employees in similarly classified positions for every hour worked.

Community Service Jobs (CSJ)

The CSJ work training placement is for individuals who are determined not ready for immediate regular employment, particularly where attempts to place a participant in an unsubsidized or Trial Job have not succeeded. CSJs are intended to provide participants with an opportunity to develop or improve work habits and skills that are necessary to succeed in any regular job environment, including punctuality, reliability, work social skills (such as learning to get along with co-workers) and the application of a sustained and productive effort. A prorated CSJ placement may be appropriate for individuals who are already working in an unsubsidized job less than 30 hours per week and where attempts to increase the number of hours in their current job or to find additional unsubsidized employment have not succeeded.

CSJ participants are generally expected to participate 40 hours per week - up to 30 hours per week of work training activities and up to 10 hours of education and training. CSJ participants eligible for a prorated CSJ payment are also expected to participate up to 40 hours per week in a combination of hours in their unsubsidized job, work training activities and education and training activities. The participant is assigned CSJ activities that do not interfere with the hours they are expected to work at the unsubsidized job.

An individual is permitted to participate at the CSJ level for no more than 24 months. Each CSJ position may be scheduled for a period of up to six months with an opportunity for a three-month extension in the rare instances where readiness for regular employment is slow to develop. A monthly CSJ benefit is \$673 with a reduction of \$5.15 for each hour that the participant fails, without good cause, to participate in assigned activities. Prorated CSJ payments are based on the number of hours the participant is assigned to work training:

- 1/3 CSJ: \$230 for up to 10 hours of work training and up to 10 hours of education and training per week.
- 1/2 CSJ: \$341 for 11 to 15 hours of work training and up to 10 hours of education and training per week.
- 2/3 CSJ: \$452 for 16 to 20 hours of work training and up to 10 hours of education and training per week.

CSJ work training providers are expected to offer real work training opportunities with appropriate supervision within an environment which generally replicates that of regular employment, realizing that job coaching and mentoring may be needed to help the participant succeed.

CSJ participants may be required to participate up to 10 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- Employer-sponsored training;
- English-as-a-Second-Language; and
- Adult basic education courses.

An 18 or 19 year old CSJ participant who has not obtained a high school diploma or a declaration of high school graduation may attend a high school or GED course of study to satisfy, in whole or in part, the required hours of participation in a CSJ.

W-2 Transition (W-2T)

The W-2T work training placement is for individuals who have been determined to have multiple barriers to employment and are unable to successfully participate in one of the other W-2 work training placements or unsubsidized employment for reasons such as alcohol or drug abuse; an individual's incapacitation; or the need to remain in the home to care for another W-2 group member who has a severe incapacitation or disability. An individual can participate in a W-2T position for a maximum of 24 months. This period may be extended on a case-by-case basis by the W-2 agency.

Participants in W-2T are placed in full-time activity whenever possible. An in-depth assessment is completed with appropriate professionals when necessary. Based on the results of the assessment, which takes into consideration the limits of ability, the participant may be assigned up to 28 hours per week of work training activities and 12 hours per week of education and training. A monthly W-2T benefit is \$628 with a reduction of \$5.15 for each hour that the participant fails without good cause to participate in assigned activities.

W-2T work training activities which may be approved by the W-2 agency include:

- Community rehabilitation program - a program that provides directly or facilitates the provision of vocational rehabilitation to individuals with disabilities and that enables an individual with a disability to maximize opportunities for employment;
- Activities similar to a CSJ but with more supervision; and
- Volunteer activity.

Other W-2T activities which may be approved by the W-2 agency include:

- Alcohol and other drug abuse (AODA) services not covered by Medicaid, including evaluation, detoxification, assessment and treatment programs;
- Mental health activities, as prescribed by an appropriate health care professional;
- Counseling or physical rehabilitation activities;
- Court ordered activities;
- Activities related to obtaining shelter or retaining safety in a domestic abuse situation or other activities needed to stabilize a family;
- Other activities that the agency determines are consistent with the capabilities of the participant;

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- Caring for a family member with an incapacity of such severity that without home care, the incapacitated member's health and well-being would be significantly affected, as determined by the W-2 agency;
- Caring for a family member who is incapacitated to the degree that only marginal employment is attainable; and
- Activities to support the marginal employment and move the family with special needs closer to self-sufficiency (e.g. parenting, life skills classes, activities at the school, etc.).

W-2T participants may be required to participate up to 12 hours per week in education and training activities assigned as part of an Employability Plan. Permissible education and training activities include:

- A course of study for the granting of a declaration of equivalency of high school graduation;
- Technical college courses and educational courses that provide an employment skill;
- Employer-sponsored training;
- English-as-Second Language; and
- Adult basic education courses.

W-2 agencies must determine, based on the outcome of a W-2 participant's employability screening and education and career assessments, if a W-2 participant is more appropriate for SSI and/or SSDI than employment services. If the W-2 participant is more appropriate for SSI and/or SSDI, and the W-2 participant agrees to apply for SSI/SSDI, then in Milwaukee County the W-2 participant is referred to the SSI/SSDI Advocacy Agency for services, and in the balance of state (outside Milwaukee County) the W-2 agency provides SSI/SSDI advocacy services to facilitate timely approval for SSI/SSDI.

Technical College Participation Under CSJ and W-2T

If the agency determines that an individual is unable to obtain unsubsidized employment without additional training, the participant may be allowed to participate in a technical college education program for a maximum of two years if the agency has determined that the program will likely lead to employment. An individual placed in a CSJ or W-2T may participate in a technical college education program as part of that placement if all of the following requirements are met:

1. The participant maintains full-time status in the technical college education program, as determined by the technical college the participant attends, and regularly attends all classes;
2. The participant maintains a grade point average of at least 2.0 (or the equivalent, as determined by the technical college); and
3. The participant is employed or engages in work activities under a CSJ or W-2T for 25 hours per week in addition to class time.

Assistance to Custodial Parent of an Infant

A custodial parent of a child who is 12 weeks old or less and who meets the financial and non-financial eligibility requirements for W-2 work training placements may receive a monthly payment of \$673 and will not be required to participate in an employment position unless s/he volunteers to participate. A parent may only receive the custodial parent of an infant benefit if no other adult member of the custodial parent's W-2 group is participating or eligible to participate in a W-2 work training placement or working in an unsubsidized job.

The custodial parent is eligible for benefits beginning on the date of the child's birth or the W-2 begin date, whichever is later. If the parent is still eligible for W-2 and not able to obtain

unsubsidized employment when the child reaches 12 weeks, s/he may be immediately placed in a W-2 work training placement.

Two-Parent Family Participation

W-2 philosophy strongly emphasizes the responsibility both parents have to care for and support their children. The first parent, the parent placed in a W-2 employment position, must participate in up to 40 hours of W-2 activities per week. If the family is also receiving federally funded child care, the other parent must participate in W-2 activities equal to the difference between 55 hours and the number of hours the parent who is placed in the employment position participates in assigned activities per week. The other parent may be assigned to activities including unsubsidized employment, on-the-job training (which is non-W-2 funded) or work training experience. Additional activities above the minimum required may be assigned based on a determination by the FEP that the activities will best prepare the other parent for unsubsidized employment.

The other parent in a two-parent family not receiving federally funded child care may be offered the opportunity to participate in W-2 activities, but participation is not mandatory. If the offer to participate in activities is accepted, the FEP identifies appropriate activities for both parents taking into consideration the schedules of the parents and children in order to accommodate the family's request not to receive child care.

OTHER ELEMENTS OF W-2 WORK-BASED PARTICIPATION

Employability Plan (EP)

An EP outlines employment goals developed jointly by the FEP and the participant. The EP may also identify basic and immediate family needs (food, clothing, shelter, health care, etc.) that are needed before the family can expect to achieve and/or maintain economic self-sufficiency.

W-2 Screening and Assessment

Participant assessment has been a core function of the FEP since implementation of W-2. As the caseload declined over the first few years of the W-2 program and the ratio of participants with significant employment barriers increased, greater emphasis needed to be placed on upfront services to identify barriers. As a result, a work plan centering on screening and assessment was implemented in 2001 that strengthened the focus on assessment in W-2 policy, performance standards, and W-2 agencies' program plans.

Simultaneous to the development of the Department's workplan, the Wisconsin State Legislature passed 2001 Wisconsin Act 16, requiring the Department to promulgate rules to implement screening for domestic abuse among W-2 participants and training for W-2 agency staff in domestic abuse issues. Through the Department's authority to promulgate rules for the administration of the W-2 program, amendments were made to DWD 12/DCF 101 related to: 1) W-2 agency screening for domestic violence and training of agency workers in domestic violence; and 2) A requirement that W-2 agencies administer a functional screening process developed by the Department. This functional screen came to be known as the Barrier Screening Tool (BST).

Implemented in May 2003, the BST provides a more consistent process for determining participant barriers statewide. The tool is administered to new participants within 30 days after their initial placement in W-2 in order to identify the potential presence or risk of a personal barrier to normal functioning in an employment setting. In addition, individuals who were

ongoing participants at the time the screening tool was implemented were administered the tool at their next W-2 review of eligibility. The BST includes a functional screen that looks at the ability of the participant to function in activities of daily living and a domestic violence screen. Based on answers provided on the functional screen, a follow-up screen (a.k.a. Screen 2) may be triggered that looks more closely at conditions that often go unidentified but are significant barriers to the participant becoming employed. The conditions that Screen 2 looks at include learning disabilities, trauma (e.g., Post Traumatic Stress Disorder), mental health, AODA and traumatic brain injuries.

The responses to the BST questions provided by each participant assist the FEP in determining if the participant could benefit from a formal assessment by a professional. The formal assessment results, in turn, enable the FEP to make a more informed decision about the participant's W-2 placement, the activities s/he is assigned to and any special services or work site accommodations that s/he may need.

A new section was added to the BST in November 2003 that addresses the special needs of other family members. The questions help determine if special consideration must be given for a family member's needs when a participant is assigned to work, training or other activities.

The Department partnered with the University of Wisconsin-Milwaukee Center for Addiction and Behavioral Health Research to design the BST. Dr. Gwat Yong Lie and Dr. Susan Rose provided research and recommendations on various screening tools that have been tested and found to be valid and reliable with similar populations in other states.

Educational Needs Assessment

Agencies must conduct an educational needs assessment with all new applicants who meet financial and non-financial eligibility for W-2. The educational needs assessment must always be completed before making a W-2 placement decision. The assessment must:

- 1) Identify the applicant's current education and training levels; and
- 2) Determine the applicant's education and training needs considering the following:
 - A. The information gathered on the applicant's current education and training levels;
 - B. The level of education and training necessary to obtain full-time employment in the local labor market;
 - C. The applicant's personal employment goals.

If the FEP determines that the individual is eligible for W-2 and s/he needs or would benefit from education or training activities, including a course of study meeting the standards established for the granting of a declaration of high school graduation, the education and training activities must be included in the individual's Employability Plan (EP).

If the individual is placed in Unsubsidized Employment or a Trial Job and that individual needs and wishes to pursue basic education, including a course of study meeting the standards established for the granting of a declaration of equivalency of high school graduation, the W-2 agency must include the activity in the individual's EP. Basic education activities identified may include:

- Writing skills;
- Math skills;
- Improving literacy;

- Remedial education;
- HSED/GED preparation classes;
- English-as-a-Second Language (ESL)

W-2 agencies must pay for the basic education services identified in the EP.

W-2 Fact Finding Process

This section of the State Plan includes an explanation of how the State provides opportunities for applicants and participants who have been adversely affected to be heard in a State appeal process. Wisconsin's Fact Finding process can be found in Chapter 19 of the W-2 Manual at <http://dcf.wisconsin.gov/w2/manual/default.htm> (formerly http://www.dwd.state.wi.us/dws/manuals/w-2_manual/chapter_19/19.1.0.htm).

Individuals who believe that an agency decision regarding any component of W-2 (e.g., employment positions, Job Access Loans, Child Care, and Emergency Assistance) is incorrect may request a Fact Finding review by the W-2 agency. The W-2 agency must respond by completing an expeditious review of the case to prevent harm to the client in the event of an agency error. The Fact Finding review is an informal process to resolve issues, explain the proposed action or inaction, and permit the petitioner to present information. Each W-2 agency must have at least one individual assigned to complete Fact Finding reviews. The fact finder must be neutral and provide an objective review and decision on the Fact Finding request. W-2 agencies are bound by the Fact Finding decision for a particular case and must comply with the decision within 10 days of the decision date.

A second level of review is completed by the Department of Administration, Division of Hearings and Appeals (DHA) if the applicant or participant petitions the DHA for a review of the W-2 Fact Finding decision. This review is limited to review of the record and the decision of the fact finder. The W-2 agency may also request DHA to review a Fact Finding decision at any time.

If a Fact Finding decision overturns the agency's action of denying W-2 payments at either level of review, the W-2 agency shall place the individual in the first appropriate employment position. Payment begins on the date the individual begins participation and no retroactive cash payment for the period prior to participation shall be issued. The W-2 agency is required to restore any payments that were improperly calculated, reduced or terminated retroactive to the date of occurrence.

In addition to the Fact Finding process, each W-2 agency is required to have on file with the Department of Workforce Development a Civil Rights Compliance (CRC) Plan that assures that the population to be served in the geographic area under each contract within the State is provided equal access to W-2 services. The requirements and format for the CRC Plans are found at http://dcf.wisconsin.gov/civil_rights/plans_instructions.htm (formerly http://www.dwd.state.wi.us/dws/civil_rights/plans_instructions.htm).

Child Care and W-2 Participation

A single parent placed in a CSJ or W-2T position cannot be assigned work activities during a period of time s/he is unable to obtain child care for a child under the age of thirteen. However, the participant may be assigned to other activities which may be performed in the home. FEPs must track these participants closely to ensure they are placed in work activities as soon as a child care provider has been located.

An inability to obtain child care must be based on the following reasons:

1. **Formal child care is not available within a reasonable distance from the parent's home or work site.** Formal child care means at least one licensed or certified child care facility with space available for the child for which there is no documentation that the facility would be harmful to the health or safety of the child.

Reasonable distance means no more than 60 minutes travel time one-way, using available transportation, from the parent's home to the child care provider's location to the parent's work site. Travel time may be extended up to 90 minutes one-way if there is a good placement opportunity for the participant AND the participant is willing to enter into this arrangement.

and

2. **Informal child care by a relative or under other arrangements is unavailable or unsuitable.** Informal child care is defined as an arrangement in which the child care provider is neither licensed nor certified. Participants who use this type of arrangement are not eligible for W-2 child care assistance. Informal child care arrangements may be used by any W-2 participant; however, a participant cannot be required to use informal child care.

If the participant fails to demonstrate an inability to obtain child care, s/he must resume W-2 work activities or face payment reductions, or possibly a strike, for nonparticipation.

Community Involvement

Community involvement is another key aspect of the W-2 program. Collaboration between employers, community resources, the business community, advocate groups and government programs creates an environment that translates into jobs and positive community involvement for low-income workers statewide. Community Steering Committees are public/private partnerships established under legislation to provide ties to W-2 agencies, with strong leadership from the business sector. They serve as problem-solving boards to the local agencies and collaborate with the Children's Services Network, a one-stop access to all supportive services in the county that benefit children and families.

CASE MANAGEMENT SERVICES

Learnfare Case Management Services

Learnfare is a component of the W-2 program that requires all school age children of W-2 participants to be enrolled in school. Students who are not enrolled in school or who are dropouts, returning dropouts, habitual truants or minor parents are required to participate in case management. Learnfare case management focuses on services to maintain school enrollment, improve school attendance and prepare children for a career. For high school students, Learnfare case management focuses on graduation, career and/or employment planning, job readiness and job seeking/job retention activities. For minor parents, Learnfare case management also focuses on parenting and life skills. A financial penalty may be imposed for not being enrolled in school or not participating in case management, if required to do so. The financial penalty is in the amount of \$50 per month per child, not to exceed \$150 per W-2 group per month. A financial penalty must not be imposed on students who volunteer for case management. The FEP or Learnfare specialist determines if a student and his/her parent had good cause for failing to cooperate with Learnfare case management.

Case Management for Pregnant Women

A pregnant woman whose pregnancy is medically verified and who is both non-financially and financially eligible except that she is not a custodial parent of a dependent child is eligible for job search assistance and case management services provided by the W-2 agency. Case management services may include making the appropriate referral to access child care or discussing employment goals for the W-2 group when the child is over 12 weeks. A pregnant woman cannot be required to participate in an employment position until the child is 12 weeks old. There is no penalty for non-cooperation with child support for a pregnant woman or while the child is less than 60 days old.

Minor Parent Case Management

Custodial parents are not eligible to participate in a W-2 work training placement until they have reached the age of 18. By eliminating eligibility for cash assistance for a minor, W-2 has created a stronger tie of responsibility to the adult parent and a better opportunity for the minor parent to complete high school and prepare for a career.

A custodial minor parent is eligible, regardless of income, assets, or living arrangement to meet with a FEP, who can provide a minor parent with information about available child care services, high school and school to work preparation, employment and financial planning, family planning services, community resources and eligibility for Medicaid, FoodShare and other food and nutrition services.

A minor parent living independently is counseled by the W-2 agency on the importance of living in an adult-supervised living arrangement, beginning with the assumption that the best option is for the minor to live with his or her parent(s). If needed, other living arrangements are discussed, such as living with a kinship care relative. In some cases, the W-2 agency must refer the minor parent to child welfare authorities and advocate for locating a suitable living arrangement.

Non-custodial Parent (NCP) Case Management

W-2 NCP case management is a voluntary program for the unemployed or underemployed NCPs. The W-2 agency may provide job search assistance and employment and training assistance as part of the case management provided to non-custodial parents to facilitate entry into the labor market and increase capacity to make consistent child support payments for the benefit of the minor child(ren). The goal is to enable W-2 custodial parents to become self-sufficient by ensuring regular child support payments in combination with employment. In addition, it is expected that by meeting their financial obligation, non-custodial parents will also demonstrate enhanced contact with, and emotional investment in their children.

In order for a NCP to be eligible for these services, s/he must be under a current child support order or in the process of having one established, and the custodial parent must be a W-2 participant.

OTHER FEATURES OF THE FEDERAL TANF PROGRAM

Credit Establishment and Credit Repair Assistance

Financial literacy services, which include training on budgeting, obtaining and managing credit and overall money management, are one of the supports W-2 participants need to maintain self-sufficiency. To address this need, W-2 agencies provide or contract with another entity to provide credit establishment and credit repair assistance to W-2 participants to ensure their financial stability.

TANF Eligible FoodShare Recipients

Wisconsin plans to use TANF funds for employment and training services for FoodShare recipients who: 1) have income at or below 130 percent of the FPL; 2) are the custodial parents of minor children; and 3) are mandatory participants in the FoodShare Employment and Training (FSET) program. These individuals will be eligible for the same services provided under W-2 with the exception of a placement in a W-2 employment position (i.e., Trial Job, CSJ, or W-2T). Eligible activities may include job readiness and motivational activities, employment counseling, job seeking skills training, job survival/retention training, life skills training, and short term education and training directly related to employment opportunities.

Milwaukee County Safety Services

Using 100% federal TANF funds under the administration of DHFS/DCF, the Safety Services program provides up to five months of safety services to families referred by the assessment units of the child welfare system in Milwaukee County. DHFS/DCF contracts with a safety service coordinator for each of the five neighborhood service delivery sites. These coordinators will be responsible for managing the safety services program and providing safety services managers and providers.

During the period of service, an assigned safety services manager and provider works with the family to assist them in controlling for child safety, stabilizing family functioning, and accessing necessary formal and informal supports. Families will receive services that are appropriate to their specific situation as determined by the assessment social worker and the safety services manager.

Milwaukee County Child Welfare Prevention Services

Using 100% federal TANF funds under the administration of DHFS/DCF, the state coordinates, implements, evaluates and manages a comprehensive and collaborative program to prevent child abuse and neglect in Milwaukee County. This lead agency sub-contracts with community-based organizations to provide services to families to prevent child abuse and neglect in Milwaukee County.

Child Care

For the entire period of this state plan Wisconsin will use co-mingled federal and state TANF funds to provide child care.

Wisconsin provides child care subsidies to families whose income is less than 185 percent of the FPL regardless of whether they are or have been on W-2. Families may remain eligible with income up to 200 percent of the FPL. There are no time limits for family eligibility and parents in W-2 child care have the option of selecting a child care provider from a wide variety of choices. Eligibility for child care is determined by W-2 agencies.

In addition to using the Child Care Development Fund (CCDF) and state general purpose revenues, TANF funds are also used to pay for child care for participants in W-2 and for low-income working parents. The child care subsidy is not counted as assistance for parents in unsubsidized employment. Child care subsidies paid for by TANF funds are governed by the same policies as subsidies funded by CCDF. These policies include eligibility criteria (but no asset test) as well as a co-payment requirement provision. Wisconsin plans to transfer funds from the TANF block grant to the CCDF as allowed under PRWORA.

Employment Transportation Program

For the entire period of this state plan Wisconsin will use federal and state TANF funds to provide employment transportation.

Reliable, affordable and efficient transportation is critical to self-sufficiency. Wisconsin has made it a priority to work with job seekers, employers and local service providers to address transportation needs for low-income families. Employment and training staff (W-2 agencies, Job Centers, other local partners) work closely with Community Steering Committees, Children's Services Networks, existing transportation service providers, Regional Planning Commissions, Metropolitan Planning Organizations and employers to determine the best use of existing resources and the best methods to meet the employment transportation needs in their communities.

W-2 agencies use innovative methods to meet participant transportation needs such as arranging van pools, setting up volunteer driver programs, accessing loan resources for personal vehicle purchase and repair, encouraging employer-based transportation programs, expanding transit hours and service areas and hiring transportation coordinators. These programs are available to people who are enrolled in a component of the W-2 program and are generally offered on an individual basis.

DWD created a joint grant program with the Wisconsin Department of Transportation (DOT), called the Wisconsin Employment Transportation Assistance Program (WETAP). This program uses state funds administered by DWD and DOT to match and draw down Job Access and Reverse Commute (JARC) dollars from the Federal Transit Administration. This has allowed Wisconsin to maximize resources and encourage even greater coordination and collaboration among local providers. The objectives of the program are to help low income individuals and families obtain, retain, and advance in employment. All transportation activities are eligible, but they must be based on needs assessment and local planning.

The grant program began April 1, 2000. New grantees were selected on a biennial basis. Local agencies, authorities, non-profits, and tribal governing agencies are eligible to apply. Local collaboration between all interested parties is required for needs assessment, plan development, and local implementation. The plan requires input from employers and potential participants.

All current and potential W-2 participants, FoodShare recipients, and others receiving supportive services and whose gross income is at or below 200 percent of the FPL are eligible for assistance. WETAP further enhances the strong commitment Wisconsin has made to helping low-income families overcome employment transportation barriers. No TANF funds currently are budgeted for the WETAP program. The state funds administered to DWD for the WETAP program currently are not anticipated to be used as a TANF MOE program. If DWD identifies a need for additional MOE sources, it may consider program modifications as necessary to ensure some or all state funds meet MOE requirements.

Emergency Assistance

For the entire period of this state plan Wisconsin will use co-mingled federal and state TANF funds to provide Emergency Assistance.

The Emergency Assistance (EA) program is designed to meet the immediate needs of eligible persons facing a current emergency. The emergency must be due to fire, flood, natural disaster, energy crisis, impending homelessness, or homelessness. EA is intended to avoid destitution of a child and provide living arrangements for the child in a home. It is not necessary for individuals to receive any other forms of public assistance in order to receive EA. W-2 agencies are responsible for administration of EA. However, in Milwaukee, the administration of EA is split between the W-2 agencies who administer the impending homelessness portion and the Milwaukee County Human Services Agency who administers the rest of the program.

An EA group must contain a child under age 18 and a caretaker relative with whom a child is living. Each member of the EA group must be a resident of Wisconsin and a citizen or qualifying alien, as defined under W-2 policy. The amount of the EA payment is the lower of:

- \$150 for each eligible EA group member;
- the amount requested by the group; or
- the total financial need due to the emergency.

The actual amount of necessary unpaid monthly expenses (housing, food, utilities, transportation, medical and child care) is considered when determining the total financial need of the group. If an individual does not agree with the agency's decision regarding EA eligibility or payment amount, a W-2 Fact Finding Review may be requested.

Grants to the Boys & Girls Club of America

For the entire period of this state plan Wisconsin will use federal and/or state TANF funds to provide these grants.

The Department provides grants to the Boys & Girls Club of America in Wisconsin to provide services through their Gang Outreach Program to improve the social, academic and employment skills of low income, TANF eligible youth. The objectives of the program are to improve the social, academic and employment skills of low income, TANF eligible youth, from five to 18 years of age, who are eligible for the free and reduced lunch program.

Kinship Care

For the entire period of this state plan Wisconsin will use co-mingled federal and state TANF funds to provide Kinship Care.

Kinship Care is a child-only payment. Relative caretakers are providing a service that allows displaced children to remain in the care of their extended family. The Kinship Care program preserves the ability to place children with relatives while providing appropriate oversight of placements to ensure children's safety and well-being. DHFS/DCF oversees the administration of the program. As a child-only benefit, there is an assumption that these children are truly needy and generally have no income of their own with the possible exception of child support. If the child support payment exceeds \$215 (amount of Kinship Care benefit per child), the child is not eligible for Kinship Care.

Relative caretakers are not required to participate in W-2 work training placements to receive financial support for the children. W-2 is a work-based system intended to provide opportunities

to parents to provide for their children. Relatives caring for children who are not their legal responsibility are providing a service to the child and the community and have no work requirements.

Under Kinship Care, relative caretakers are eligible for a child only benefit if all of the following conditions are met:

1. The Kinship Care relative applies to the county or tribal social/human services child welfare agency. The agency completes an assessment and determines if there is a need for the child to be placed with the kinship care relative and if the placement with the kinship care relative is in the best interest of the child.
2. The county or tribal social/human services agency determines that the child meets one or more of the criteria specified in s. 48.13, Stats., or s. 938.13, Stats., or that the child would be at risk of meeting one or more of those criteria if the child were to remain in his or her home. (Note: These statutory sections relate to children in need of protection or services. The chapter numbers relate to the Children's Code and the Juvenile Justice Code.)
3. The county or tribal social/human services child welfare agency conducts a criminal background check on the kinship care relative, any other adult resident of the kinship care relative's home and any employees or prospective employees of the kinship care relative who have or would have regular contact with the child. The primary purpose of the background check is to determine if they have any arrests or convictions that could adversely affect the child or the kinship care relative's ability to care for the child.
4. The Kinship Care relative cooperates with the county or tribal social/human services agency in the application process, including applying for other forms of assistance for which the child may be eligible.
5. The child for whom the Kinship Care relative is providing care and maintenance is not receiving supplemental security income (SSI) or state supplemental payments.

The Kinship Care payment amount is similar to previous AFDC payment levels in Wisconsin--\$215 per child per month. In addition, kinship care children will remain non-financially eligible for Medicaid and FoodShare benefits. The income and assets of kinship care relative caretakers are not considered in the kinship care eligibility determination. A kinship care eligibility review must be completed at least every twelve months.

WISACWIS is an automated system that assists caseworkers and administrators in managing child welfare services, including intake, eligibility determinations, case management, court processing, financial reporting, and administration. TANF funds are being used to support the portion of implementation and ongoing support costs related to the Kinship Care program.

DEPARTMENT OF HEALTH AND FAMILY SERVICES/DEPARTMENT OF HEALTH SERVICES

SSI Caretaker Supplement

For the entire period of this state plan Wisconsin will use co-mingled federal and state TANF funds to provide SSI Caretaker Supplement.

W-2 legislation provides that an individual who is a recipient of SSI is not eligible for participation in a W-2 employment position. Recipients of SSI have been determined permanently disabled, incapable of supporting themselves through employment, and therefore not appropriate for placement in a time-limited employment program.

To help with the support of SSI recipients' dependent children, a monthly benefit funded under TANF and state general purpose revenue (GPR), called SSI Caretaker Supplement (CTS), is issued for each eligible child who meets all of the following criteria:

1. The child's sole custodial parent receives SSI or the child lives with both custodial parents and both receive SSI. In either circumstance, the caretaker(s) receive \$250 for the first eligible child and \$150 for each subsequent eligible child.
2. The child meets financial and non-financial AFDC eligibility criteria. If the family passes the AFDC eligibility test, the CTS payment is made.
3. The child does not receive SSI benefits.

The CTS program is separate from the W-2 program and is administered by Wisconsin's DHFS/DHS.

DEPARTMENT OF REVENUE

Earned Income Tax Credit

For the entire period of this state plan Wisconsin will use co-mingled federal and state TANF funds to provide Earned Income Tax Credits.

Beginning in FFY 99, Wisconsin's Department of Revenue provides a TANF and state funded earned income tax credit (EITC) for the refundable portion of the Wisconsin's EITC program for low-income families. All families receiving the state credit are determined to be categorically eligible for TANF. (Note: Nonrefundable amounts and EITC payments made to qualified aliens are paid with state tax revenues).

This credit provides a supplement to the wages and self-employment income of lower-income workers with children living with them. Under the Wisconsin program, persons may be eligible to receive the tax credit if they or their spouse worked full or part-time during the tax year, had at least one qualifying child, were a full-year resident of Wisconsin, and qualified for the federal EIC. The state credit is calculated as a percentage of the federal credit as follows: four percent for families with one child; 14 percent for families with two children; and 43 percent for families with three or more children.

SEGREGATED STATE TANF PROGRAMS

As delineated in the preamble to the final Federal TANF Regulations, many factors contribute to poverty and dependency, and solutions to these problems should not be "one size fits all." The system should allow States and localities to develop diverse and creative responses to their own problems. Wisconsin has taken this opportunity provided under TANF to partner with communities and other organizations to serve families in new, more creative, and more effective ways. The following programs are part of the State's TANF program and are funded solely with state GPR or segregated funds.

Wisconsin received federal approval in the FFY 1995 JOBS Supportive Service Plan to include human service expenditures made on behalf of AFDC recipients as eligible for federal reimbursement. Services listed in the Supportive Services plan include child care; family preservation services; and AODA and mental health services not covered under the Medicaid program. The costs of the services that are associated with the assignment of non-medical alcohol and drug abuse activities and mental health services to enable participation in the W-2 program and obtain and/or maintain successful employment, are not covered by Medicaid. To the extent local agencies identify non-federal resources spent on TANF-eligible individuals, Wisconsin may include these amounts in its MOE calculation.

W-2 Services for Qualified Aliens

From FFY2006-2008 Wisconsin reported this program for MOE as a Separate State Program. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

Wisconsin provides benefits and services to qualified aliens without regard to the restrictions found under 8 USC 1612 and 1613. The following qualified aliens may be eligible for W-2, subject to the same eligibility determination used for citizen applicants:

- An alien lawfully admitted to the United States for permanent residence under the Immigration and Nationality Act;
- An alien granted asylum under section 208 of such Act;
- A refugee admitted to the United States under section 207 of such Act;
- An alien paroled into the United States under section 212(d)(5) of such Act;
- An alien whose deportation is being withheld under section 243(h) or 241(b)(3) of such Act;
- An alien granted conditional entry pursuant to section 203(a)(7) of such Act as in effect prior to April 1, 1980;
- An alien who has been certified as a victim of trafficking;
- An alien who is granted status as a Cuban and Haitian entrant, as defined in section 501(e) of the Refugee Education Assistance Act of 1980;
- An American Indian born in Canada who is at least 50% American Indian by blood, or born outside of the United States who is a member of a federally-recognized Indian tribe;
- A alien who has been battered or whose child has been battered;
- An alien admitted to the United States as an Amerasian immigrant, as described in section 584 of the Foreign Operations, Export Financing, and Related Programs Appropriations act of 1988;
- An alien lawfully residing in the United States who is an honorably discharged veteran, in active duty in, or the spouse or unremarried surviving spouse (under specified circumstances) of a veteran or active member of the U.S. armed forces; or
- An alien lawfully residing in the United States who is authorized to work by the Immigration and Naturalization Service.

Children First Program

From FFY2006-2008 Wisconsin reported this program for MOE as a Separate State Program. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

Children First is a Responsible Fatherhood program which promotes the emotional and financial responsibility of the non-custodial parent to his or her children. The non-custodial parent, who has no current means of meeting a child support obligation, is behind in child support payments and does not work full-time, may be ordered by the court to participate in the Children First program. Judges are given the discretion to determine which non-custodial parents should be referred to the program based on their lack of financial resources and, therefore, no uniform income eligibility requirements have been set. The Children First program operates concurrently with the W-2 program. Federal approval for the use of waiver savings funds for Children First was received on January 4, 1993. Currently the Children First program is funded solely with state funds, including the state's share of certain assigned child support, and is counted as TANF MOE under a "grandfather" provision.

The Children First program requires a court order mandating non-custodial parent participation in the program. The program provides, at a minimum, job search assistance, work experience, education, training opportunities and case management services designed to enable eligible non-custodial parents to obtain and retain employment. The overall result, that of developing a bond between the non-custodial parent and the child(ren) and a communication line between the non-custodial parent and the custodial parent, is essential.

The Children First program is successfully completed when a participant makes full child support payments for three consecutive months or completes 16 weeks of employment and training activities. If these goals are not achieved, the participant may be referred to court for appropriate disposition. A crucial element to the success of the program is the partnership between the court system, the child support agency and the administering Children First agency.

Child Support Pass-Through

Cooperation with the child support agency is a requirement for receipt of W-2 services. Through December 31, 2005, Wisconsin has been given authority to operate a Child Support Demonstration waiver project to pass all collected child support directly to W-2 participants.

Under the demonstration, individuals participating in an employment position received all or a portion of the current child support money collected each month, depending on their random group assignment. W-2 applicants were assigned to one of three groups: control, experimental or non-experimental (After July 1999 all new W-2 participants have been assigned as non-experimental). Participants assigned to the experimental and non-experimental groups directly received all child support paid for current support or paid for arrears accrued when receiving W-2 cash assistance. Prior to July 1, 2002 participants in the control group received up to \$50 or the state share (41%) of the child support collected, whichever was greater. After July 1, 2002 as part of the second phase of this waiver, the control group participants received the same child support pass through as the experimental and non-experimental groups.

Due to the expiration of the Child Support Demonstration waiver project, effective January 1, 2006, Wisconsin phased-out the federal share (57.65%) of child support passed through to families: seventy-five (75) percent of the federal share was passed through to families from January 1 through March 31, 2006; fifty (50) percent of the federal share from April 1 through

June 30, 2006; and twenty-five (25) percent of the federal share from July 1 through September 30, 2006. Beginning October 1, 2006, only the state share (42.35%) is passed through to families.

DWD/DCF conducts public awareness efforts to communicate changes in child support pass-through to custodial parents, non-custodial parents, W-2 agencies and other partners who work with affected families.

Child support received by the family is not used to determine eligibility for W-2 and does not affect W-2 payments. The state share of the amounts passed through to W-2 recipients are in Wisconsin's Maintenance of Effort (MOE) calculation.

Job Access Loans

Job Access Loans (JALs) are short-term, no interest loans designed to meet expenses related to obtaining or maintaining employment. JALs are designed for an individual needing assistance because of a discrete financial crisis that cannot be resolved with personal resources and other funding sources are not available. This crisis, if unresolved, could develop into a long-term problem in which the individual may become dependent upon a W-2 employment position. The individual must meet financial and non-financial eligibility conditions under the W-2 program.

The W-2 agency can approve a JAL from \$25 to \$1600. Some examples of appropriate use of JALs include:

- Car loans for purchase of a vehicle or repairs to provide transportation to work or to look for work;
- Fees for obtaining a drivers license;
- Clothing/uniforms for work;
- Rent or security deposits, to prevent eviction and enable the individual to obtain or maintain employment; and
- Self-employment/entrepreneurial activities. As a condition of any self-employment or entrepreneurial loan, the W-2 agency must require a business plan approved by a traditional loan institution or an organization specializing in entrepreneurial efforts, such as the Wisconsin Women's Business Initiative Corporation or the National Foundation for Training Entrepreneurship.

The W-2 agency has sole discretion in determining and authorizing JALs. The loan recipient must develop a repayment plan approved by the W-2 agency. The loan may be paid back in cash or through a combination of cash and volunteer community work.

Brighter Futures and Tribal Adolescent Services Programs

From FFY2006-FFY2008 Wisconsin included this program in the state plan but did not identify the program type nor report it as MOE. A review of the criteria for being a TANF program resulted in this program being reported as a Segregated State Program beginning in FFY09.

Under the administration of the DHFS/DCF the Brighter Futures and tribal adolescent services programs award state-funded grants to nonprofit corporations and public agencies in Milwaukee County, county social services agencies in other counties, and Native American tribes or bands. The purpose of the grants is to fund programs for the prevention of youth violence, substance use and abuse, child abuse and neglect, and non-marital pregnancy, and for the promotion of adolescent self-sufficiency.

Domestic Abuse Services

From FFY2006-FFY2008 Wisconsin included this program in the state plan but did not identify the program type nor report it as MOE. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

DHFS/DCF will use state funds to support the following domestic violence services:

- grants to domestic violence agencies to fund additional support services for victims of domestic violence and their children; programs for children who have witnessed domestic violence; legal advocacy; and programming to help victims achieve both safety and self-sufficiency.
- grants to organizations to provide domestic violence services to members of traditionally under-represented populations, including racial/ethnic minority groups and persons with disabilities;
- funding to the Wisconsin Coalition Against Domestic Violence to support a staff person to provide assistance in obtaining legal services for victims from under-represented populations.

State funds will target families with minor children, with income at or below 250 percent of poverty. Agencies must either obtain income information or eligibility information for another relevant program (e.g., W-2, food stamps, energy assistance, Medicaid, free or reduced school lunch, child care assistance) to determine who qualifies as eligible. This initiative also provides domestic abuse services to refugees and former refugees that have become citizens.

DEPARTMENT OF HEALTH AND FAMILY SERVICES/DEPARTMENT OF HEALTH SERVICES

Substance Abuse Services

For FFY2006-FFY2008 Wisconsin included this program in its plan as a Separate State Program for MOE. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

DHFS/DHS solicited proposals to provide new or expanded community-based alcohol and other drug abuse treatment programs that meet the special needs of TANF eligible individuals, with problems resulting from alcohol or other drug abuse (AODA) in Milwaukee County. The grants were awarded based on the programs' ability to emphasize parent education, vocational and housing assistance and coordination with other community programs and with treatment under intensive care.

Burial Services

For FFY2006-FFY2008 Wisconsin included this program in its plan as a Separate State Program for MOE. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

Funding is available when a W-2 participant (individuals placed in W-2 work training placements, custodial parents of infants, and W-2 group members) dies and the estate of the deceased recipient is insufficient to pay the funeral, burial and cemetery expenses of the deceased recipient. The lesser of \$1,000 or the cemetery expenses that are not paid by the

estate of the deceased and other persons and the lesser of \$1,500 or the funeral and burial expenses not paid by the estate of the deceased and other persons may be paid. No payment is made for funeral and burial expenses if the costs for funeral and burial expenses exceed \$3,500. No payment is made for cemetery expenses if the costs for cemetery expenses exceed \$3,500 [s. 49.30, Stats.]. Costs for these burials are paid with segregated state funding, which Wisconsin will include in its MOE calculation.

FoodShare Benefits for Qualified Aliens

For FFY2006-FFY2008 Wisconsin reported this program for MOE as a Separate State Program. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

Effective August 1, 1998, Wisconsin provides state-funded FoodShare benefits to qualified aliens and their dependent children who were made ineligible for the FoodShare program solely due to provisions of PRWORA. Wisconsin currently uses state funds for any qualified aliens who are not eligible for federal Food Stamp benefits and who meet the Wisconsin FoodShare eligibility criteria. (FoodShare is the updated Wisconsin program name previously referred to as Food Stamps.)

Wisconsin uses eligibility determination and benefit levels for the federal Food Stamp Program. FSET services for those qualified aliens who would be mandatory participants under current federal guidelines are being provided under this program. Effective November 1, 1998, those qualified aliens eligible for federal Food Stamp benefits under the provisions of Public Law 105-185, the Agriculture Research, Extension, and Education Reform Act of 1998 (AREERA) were removed from the state-funded program.

DEPARTMENT OF PUBLIC INSTRUCTION

English for Southeast Asian Children

From FFY2006-FFY2008 Wisconsin included this program in the state plan but did not identify the program type nor report it as MOE. A review of the criteria for being a TANF program resulted in this program being reported for MOE as a Segregated State Program beginning in FFY09.

The Wausau School District will utilize state funding for a program to teach English to three-, four-, and five-year old Southeast Asian children in the free and reduced lunch program to promote success in school among families in the Southeast Asian community.

Student Food Programs

Effective with FFY09 the Student Food Programs have been added to the state TANF plan and reported as MOE. These are 100% state funded programs.

The Wisconsin Department of Public Instruction (DPI) administers state funded food programs in the public schools for students who meet the federal free and reduced lunch criteria. Free milk and breakfast is provided on a daily basis to eligible low-income students attending school from pre-K to grade five. The state funded school breakfast program is for students who meet the federal income criteria of the free and reduced school lunch program however these students do not meet the other requirements of the federal free and reduced school lunch program.

Support Services to Needy Students

Effective with FFY09 the Support Services to Needy Students programs have been added to the state TANF plan and reported as MOE. These are 100% state funded programs.

The Wisconsin Department of Public Instruction (DPI) provides a number of services to needy pre-kindergarten (pre-K) through grade twelve (12) students including:

- **Pre-K Services to Low Income Students**

The Wisconsin Department of Public Instruction (DPI) provides equalization aids, transportation aids, four-year old pre-K grants to its public schools, and vouchers for private schools in Milwaukee County for students in pre-K. The schools that offer pre-K to its students have a high percentage of free and reduced lunch students who are typically high risk students.

It is optional for the public schools to use equalization and transportation funds to provide pre-K education to three and four-year old children. Although optional for school districts to offer pre-K, it must be available to all if it is offered. Those included for TANF meet federal criteria for free and reduced lunches.

- The Milwaukee Parental Choice Program (MPCP) is Wisconsin's school voucher program which started in 1990. It reimburses low-income parents for their children to attend private for-profit and non-profit and/or religious schools instead of the Milwaukee District Schools, and includes pre-K. MPCP is a one hundred (100) percent low income program for those at or below either one hundred seventy-five (175) percent or two hundred twenty-five (225) percent of the federal poverty level (FPL). The FPL for MPCP depends on whether the student is new to the program, is continuing, or has siblings already in the program.
- Four-Year Old Kindergarten Start-Up Grants started in school year 2008 to encourage school districts to offer pre-K to four-year old children. This is a competitive grant program which provides one year of initial costs and one year of continuation costs. Those included for TANF meet federal criteria for free and reduced lunches.
- High Poverty/High Need K – Twelve (12) Educational Programs
DPI administers a variety of categorical aids targeted to high poverty districts, to traditionally underrepresented students, and/or to students likely to end up in poverty without additional support. Each of these programs has unique qualifiers however each is intended to provide additional educational support to improve academic achievement and reduce future poverty. Those included for TANF meet federal criteria for free and reduced lunches. All of these targeted aids, except the preschool to grade five program, were initiated after 1995:
 - Student Achievement Guarantee in Education (SAGE);
 - SAGE Debt;
 - Aid to High Poverty School Districts;
 - Preschool to Grade Five;
 - Improving Student Achievement;
 - Alternative Education;
 - Supplemental Large Areas;
 - Scarcity Aid;
 - School District Consolidation;

WISCONSIN STATE PLAN, FFY 2006-FFY 2009

- Science, Technology, Engineering and Mathematics (STEM); and
- School Nursing Services programs.

DEPARTMENT OF ADMINISTRATION

Energy Services

Although not separately identified in the earlier plan, Wisconsin has been reporting the use of state funds for MOE for Energy Services from FFY2006-FFY2009 as a type of emergency assistance. The Wisconsin Department of Administration (DOA) provides payments to utility companies and other energy suppliers on behalf of needy families, reconnection services, crisis intervention services (i.e. furnace replacements), and weatherization services. Eligible needy families are families with children and income at or below one hundred fifty (150) percent of the federal poverty level (FPL).

SEPARATE STATE PROGRAMS

Wisconsin operates several programs in addition to the federal TANF programs that are funded exclusively with state or non-TANF funds to serve needy families and other low-income persons who are ineligible per TANF restrictions (42 USC 608). Expenditures under Separate State Programs are tracked and, when appropriate, counted toward the state's MOE requirement.

Literacy Grants

Illiteracy is one of the common barriers many of the individuals remaining in W-2 face. The Department had provided literacy grants for services to TANF eligible individuals and children to literacy providers who worked with participants to develop literacy goals and monitor progress and outcomes. While the Department retains statutory authority to continue administering literacy grants, there currently is no funding to support the program.

DEPARTMENT OF WORKFORCE DEVELOPMENT

Workforce Attachment and Advancement

For the period early 2000 through December 2003, the Workforce Attachment and Advancement (WAA) program had provided funding to W-2 agencies and Workforce Development Boards (WDBs) to develop innovative employment retention and advancement strategies for the TANF eligible population. Through WAA, W-2 agencies and WDBs worked collaboratively with employers, training providers, educational institutions, organized labor and other partners in the employment and training services delivery system to provide a variety of services tailored to the needs of their local communities. The primary objective of the program was to promote upward mobility through training that prepares persons for higher-paying employment. While the Department retains statutory authority to continue administering WAA, there currently is no funding.

DEPARTMENT OF PUBLIC INSTRUCTION

Head Start Expansion

Through the use of state and other funds, the Wisconsin Department of Public Instruction is administering Head Start programs that provide full-time care, in order to support low-income parent's work efforts

DEPARTMENT OF HEALTH AND FAMILY SERVICES/DEPARTMENT OF CHILDREN AND FAMILY SERVICES

Family Resource Centers

The Wisconsin Child Abuse and Neglect Prevention Board (also known as the Wisconsin Children's Trust Fund) utilizes state and other funds to support seventeen (17) Family Resource Centers around the state. Family Resource Centers primarily focus services on parents and their children from birth to age three. Recognizing that all parents need help at some time, but that not all families need the same kind or intensity of support, Family Resource Centers have developed a wide range of services to meet the individual needs of the community including: parenting skills training; programs that promote responsible fatherhood and increase the capacity for fathers to support their children emotionally; and activities to promote parental access and visitation.

Enclosure I: Benefits and Services Offered at Wisconsin Works (W-2) Agencies
Enclosure II: W-2 Agency Use of DWS Displacement Grievance Procedure

ATTACHMENT A1 for FFY2006-FFY2008

WISCONSIN'S TANF PROGRAM		
Federal TANF Programs	Segregated State TANF Programs	Separate State Programs
Fraud/FEV (related to TANF eligibles)	Child Support Pass-Through	W-2 Services for Qualified Aliens
State Administrative Costs	Job Access Loans	Children First
W-2 Office	Energy Services	Substance Abuse Services
W-2 (Trial Jobs, CSJ, W-2 T Payments)		Burials (Related to TANF Eligible)
Custodial Parent of Infant Children		FoodShares Benefits for Qualified Aliens
Learnfare Case Management		Workforce Attachment and Advancement
Case Management Only		Literacy Grants
Non-Custodial Parents of W-2 Children		Human Services
TANF-Eligible Food Stamp Recipients		
Safety Services		
Child Welfare Prevention Services		
Emergency Assistance		
Employment Transportation		
Child Care		
Grants to Boys & Girls Club of America		
Earned Income Tax Credit		
Kinship Care-		
SSI Caretaker Supplement		

Note: The 2006-07 Wisconsin Biennial Budget Act removed TANF funding for the following programs however the Act continued state funding to the Wisconsin Departments for these programs. These programs were excluded from the above chart because DWD and the other Departments currently anticipate that these programs will be operated outside TANF and not claimed as TANF MOE, however, the expenditures in these programs continue to meet TANF MOE eligibility criteria.

- English for Southeast Asian Children
- Domestic Abuse Services
- Domestic Abuse Services for Traditionally Under-Represented Racial and Ethnic Minorities
- Brighter Futures and Tribal Adolescent Services
- Head Start Expansion
- Family Resource Centers

ATTACHMENT A2 for FFY2009

WISCONSIN'S TANF PROGRAM		
Federal TANF Programs including Co-Mingled State Funds	Segregated State TANF Programs*	Separate State Programs
W-2 Office	W-2 Services for Qualified Aliens	Literacy Grants
W-2 (Trial Jobs, CSJ, W-2 T Payments)	Children First	Workforce Attachment and Advancement
State Administrative Costs	Child Support Pass-Through	Head Start Expansion
Case Management Only	Job Access Loans	Family Resource Centers
Custodial Parent of Infant	Brighter Futures and Tribal Adolescent Services	
Learnfare Case Management	Domestic Abuse Services	
Non-Custodial Parents of W-2 Children	Substance Abuse Services	
Fraud/FEV (related to TANF eligibles)	Burials Services	
Milwaukee County Safety Services	English for Southeast Asian Children	
Milwaukee County Child Welfare Prevention Services	Student Food Programs	
Child Care	Support Services to Needy Students-Pre-K to 12.	
Employment Transportation	Energy Services	
Emergency Assistance		
Grants to Boys & Girls Club of America		
Kinship Care including WISACWIS		
SSI Caretaker Supplement (CTS)		
Earned Income Tax Credit		

* Certain Human Services are grandfathered from AFDC.

ATTACHMENT B
-- State Plan Certifications --

This has been designed to enable the Chief Executive Officer of a State to certify that the State will operate its Temporary Assistance for Needy Families (TANF) program in accordance with the statutory requirements in section 402(a)(2) through (7).

CERTIFICATIONS

The State will operate a program to provide Temporary Assistance for Needy Families (TANF) so that the children may be cared for in their own homes or in the homes of relatives; to end dependence of needy parents on government benefits by promoting job preparation, work and marriage; to prevent and reduce the incidence of out-of-wedlock pregnancies and establish annual numerical goals for preventing and reducing the incidence of these pregnancies; and encourage the formation and maintenance of two-parent families.

This program is generally known as: Wisconsin Works

Executive Officer of the State (Name): Jim Doyle, Governor

In administering and operating a program which provides Temporary Assistance for Needy Families with minor children under title IV-A of the Social Security Act, the State will:

1. Specify which State agency or agencies will administer and supervise the program under part A in all political subdivisions of the State:

Wisconsin Department of Workforce Development and Department of Health and Family Services are the agencies responsible for administering the program through December 31, 2007; and the

Wisconsin Department of Children and Families and Department of Health Services as of January 1, 2008.

Wisconsin Department of Workforce Development and Department of Health and Family Services are the agencies responsible for supervising the program through December 31, 2007; and the

Wisconsin Department of Children and Families and Department of Health Services as of January 1, 2008.

2. Assure that local governments and private sector organizations:

- (a) Have been consulted regarding the plan and design of welfare services in the State so that services are provided in a manner appropriate to local populations; and
- (b) Have had at least 45 days to submit comments on the plan and the design of such services.

3. Operate a Child Support Enforcement program under the State plan approved under part D;

4. Operate a Foster Care and Adoption Assistance program in accordance with part E, and certify that the State will take all necessary actions to ensure that children receiving assistance are eligible for medical assistance;
5. Provide each member of an Indian tribe, who is domiciled in the State and is not eligible for assistance under a Tribal Family Assistance plan approved under Section 412, with equitable access to assistance under the State program funded under this part attributable to funds provided by the Federal Government.
6. Establish and enforce standards and procedures to ensure against program fraud and abuse, including standards and procedures concerning nepotism, conflicts of interest among individuals responsible for the administration and supervision of the State program, kickbacks, and the use of political patronage.
7. Make available to the public a summary of the State plan; and

OPTIONAL CERTIFICATION

[x] The State has established and is enforcing standards and procedures to:

- (1) Screen and identify individuals receiving assistance under this part with a history of domestic violence while maintaining the confidentiality of such individuals;
- (2) Refer such individuals to counseling and supportive services; and
- (3) Waive, pursuant to a determination of good cause, other program requirements such as time limits (for as long as necessary) for individuals receiving assistance, residency requirements, child support cooperation requirements, and family cap provisions, in cases where compliance with such requirements would make it more difficult for individuals receiving assistance under this part to escape domestic violence or unfairly penalize such individuals who are or have been victimized by such violence, or individuals who are at risk of further domestic violence.

CERTIFIED BY THE CHIEF EXECUTIVE OFFICER OF THE STATE:



Reggie Bicha, Secretary
Wisconsin Department of Children and Families

3-25-10

Date

WORK SUPPORTS

- **Child Care:** Child Care is available for eligible families that are in work, work-related or school/training activities. In most cases families are responsible to pay for part of the child care costs, based on a sliding fee schedule, to the child care provider. Child care does not have a time limit.
- **Job Access Loans:** Job Access Loans may help you meet basic costs related to getting or keeping employment. Job Access Loans must be repaid in cash, or a combination of cash and community service.
- **Transportation:** You may get help, such as bus passes or gas vouchers, from the W-2 agency to find and pay for transportation.

EDUCATION AND TRAINING

- **W-2 Education and Training:** W-2 participants may take part in education and training. This may include HSED/GED, Job Skills Training, Motivation, Life Skills, Employer-sponsored training, Literacy Education, English as a Second Language (ESL), technical college programs and others.

Ask an agency representative today if you are eligible for these or any additional programs that your local W-2 Agency may have.

Additional programs could include:

- Wisconsin Home Energy Assistance Program (WHEAP)
- Children First
- Workforce Investment Act
- Earned Income Tax Credit
- Women Infants and Children Program (WIC)

This agency has more information available on these programs. Please request brochures on programs that may be of help to you or your family.



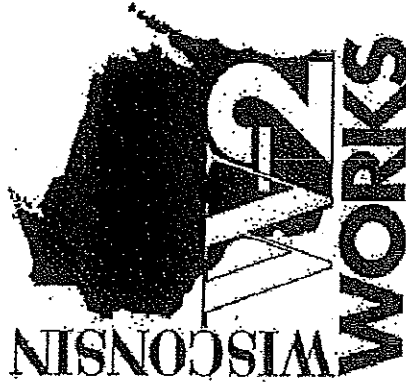
State of Wisconsin
Department of Workforce Development

DWD is an equal opportunity employer and service provider. If you have a disability and need to access this information in an alternate format, or need it translated to another language, please contact (608) 266-0327 or (866) 275-1155 TTY (Toll Free).

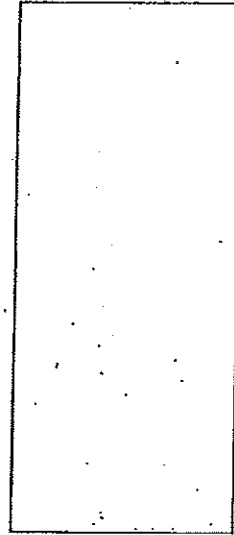
For civil rights questions call (608) 266-6889 or (866) 864-4585 TTY (Toll Free).

DWSP-11890-P (R. 06/2005)

Benefits and Services Offered at Wisconsin Works (W-2) Agencies



Please ask a W-2 agency representative about any of the following services



SERVICES AVAILABLE WITHIN THE WISCONSIN WORKS (W-2) AGENCY

FAMILY SUPPORT SERVICES

FOODSHARE: The FoodShare Program can help eligible persons and families buy the food they need for good health. FoodShare benefits come as a swipe card that can be used in most grocery stores. FoodShare is based on income and assets, not W-2 participation and do not have a time limit. FoodShare can be given on an emergency basis. The FoodShare Employment and Training Program (FSET) assists people who get food stamps to find a job through work activities and education and training.

HEALTH CARE: Medicaid and BadgerCare are health care programs that provide health insurance to low-income families, children and pregnant women to help keep families healthy. These programs have separate eligibility rules from W-2 and do not have a time limit. Families at the high end of the income limit will have a small monthly premium.

CHILD SUPPORT: The Child Support program can help establish court orders that provide both financial and medical support for minor children and collect child support payments on your family's behalf, regardless of your income.

EMERGENCY ASSISTANCE: You may be eligible for up to \$150 per family member if you are facing a current emergency for one of the following reasons: fire, flood, natural disaster, energy crisis, homelessness or impending homelessness (including potential evictions).

REFUGEE CASH ASSISTANCE AND REFUGEE MEDICAID: A cash assistance program and medical assistance program available to eligible refugees.

W-2

W-2 PROGRAM: W-2 provides a wide range of employment services and training to help eligible Wisconsin residents get and keep employment. W-2 also provides work experience positions through community service jobs, and other work-readiness placements. Work experience positions have monthly payments based on participation. W-2 offers:

- **Trial Jobs (TJ):** Trial jobs may be available if you need the extra help in finding a job. Your employer pays you and the W-2 agency gives the employer a monthly check to help cover the costs of training.
- **Community Service Jobs (CSJ):** CSJs may be available to you if you need some additional work experience to help prepare you for employment. While you are in this position, you are paid up to \$673 per month.
- **W-2 Transitions (W-2T):** W-2T positions may be available to you if you have additional problems that prevent you from being in a CSJ or Trial Job, such as you or an immediate family member is disabled. While you are in this position, you are paid up to \$628 per month.
- **Case Management:** Case management services help you stay employed and/or get additional skills to get a job with increased hours, pay and/or benefits. Case management is available for anyone who meets W-2 eligibility.

OTHER SERVICES

- **Custodial Parent of an Infant (CMC):** If your child is 12 weeks old or less, you may receive a monthly cash payment of up to \$673 and not be required to participate in other work.
- **Minor Parents Services:** Minor teen parents (under the age of 18) can get information on available child care, high school and school-to-work information, employment and financial planning services, food stamp and Medicaid information, and referrals to other community agencies.
- **Noncustodial Parents:** A noncustodial parent (NCP) may be able to get services such as skills training, job search and job orientation services, and case management.
- **Pregnant Women:** A pregnant woman, who is not a custodial parent of a dependent child, may be eligible for case management services and job search assistance. Case management services may include making the appropriate referral to child care resources or discussing employment goals.
- **Learnfare:** Learnfare helps children of W-2 participants attend and complete school.
- **Children's Services Network:** The Children's Services Network provides information for you and your children on housing, child welfare services, food pantries, and other resources in your community.
- **Emergency Payments:** W-2 T, CSJ, TJ or CMC participants may be able to get a one-time cash payment before they receive their first W-2 payment to assist with extreme financial problems.

DEPARTMENT OF WORKFORCE
DEVELOPMENT
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State of Wisconsin
Governor Jim Doyle

Attachment II

DEPARTMENT OF HEALTH AND
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TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies
Workforce Development Boards
Job Center Leads and Managers

FROM: Amy Mendel-Clemens
Communications Section
Bureau of Health Care Eligibility

BHCE/BWP OPERATIONS MEMO	
No	04-05
DATE	02/02/2004
FS	<input type="checkbox"/>
MA	<input type="checkbox"/>
SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>
CC	<input type="checkbox"/>
W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>
EA	<input type="checkbox"/>
CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>
JC	<input type="checkbox"/>
RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>
WtW	<input checked="" type="checkbox"/>
Other EP	<input type="checkbox"/>
PRIORITY: HIGH	

SUBJECT: W-2 AGENCY USE OF DWS DISPLACEMENT
GRIEVANCE PROCEDURE

CROSS REFERENCE: DWS Administrator's Memo 03-33

EFFECTIVE DATE: March 1, 2004

PURPOSE

This memorandum provides information about grievance procedures for resolving complaints of displacement of regular employees at a work site by federally subsidized Wisconsin Works (W-2) participants.

BACKGROUND

Federal law and regulations governing Temporary Assistance for Needy Families (TANF) prohibit displacement of regular workers at a work site by federally subsidized participants in this program. Accordingly, Wisconsin statutes and administrative rules prohibit such displacement under the State's primary TANF program, Wisconsin Works (W-2). Federal regulations also require states receiving federal TANF grants to establish and maintain grievance procedures for resolving complaints of alleged displacement of regular employees by federally subsidized TANF participants.

DWS Administrator's Memo 03-33 stipulates that a grievance procedure now being added to the DWS *Administration of Workforce Programs Policy and Procedure Manual* (part of the *Workforce Programs Guide* accessible on line at: http://www.dwd.state.wi.us/dws/manuals/workforce/pdf/wpg_toc.pdf), shall serve as the procedure for resolving displacement complaints under W-2 as well as under Welfare to Work (WtW) and the Workforce Investment Act (WIA).

This memo provides additional information specific to the use of this shared grievance procedure under the W-2 program. This information is also being provided in Publication DWSW-13121-P, which will be the official statement of W-2 displacement grievance policy referenced by all other documentation pertaining to that policy. This publication can be found on the DWD publications web site at:

http://www.dwd.state.wi.us/dwd/publications/dws/pdf/dsw_13121_p.pdf

POLICY

WISCONSIN WORKS EMPLOYEE DISPLACEMENT GRIEVANCE POLICY

No Wisconsin Works employment position (i.e., Trial Job (TJ), Community Service Job (CSJ), or W-2 Transition (W-2 T) placement) may be operated so as to:

- Fill a vacancy created by an employer terminating a regular employee or otherwise reducing its work force;
- Fill a position when any other person is on layoff or strike from the same or a substantially equivalent job within the same organizational unit; or
- Fill a position when any other person is engaged in a labor dispute regarding the same or a substantially equivalent job within the same organizational unit.

A regular employee of a Wisconsin Works (W-2) work-training provider/employer may file a complaint with the local Job Center Complaint Coordinator (JCCC) if s/he believes that s/he or another employee was unlawfully terminated to create a vacancy for a person in a W-2 employment position funded in whole or part by federal TANF grants (i.e., TJ, CSJ or W-2 T placement), or if s/he believes that a person in a federally-funded W-2 employment position has been unlawfully placed in a vacancy created by a labor dispute.

Procedure. Complaints of displacement must follow the procedure for "Complaints/Grievances and Appeals" outlined in the DWS *Workforce Programs Guide, Part I: Administration of Workforce Programs Policy and Procedure Manual*. The relevant excerpts from that Manual are attached to this Operations Memo as Appendix 1 (see below).

Remedies. A W-2 work training provider/employer found to have engaged in one or more of the prohibited displacement practices listed above is subject to any or all of the following penalties:

- Termination of existing W-2 work training site agreements with that work training provider/employer, after ensuring that all W-2 participants at the site are appropriately reassigned to W-2 employment positions at another site.
- Termination of other DWS-program-related work training site agreements with or grants to that work training provider/employer.

- Indefinite prohibition against future W-2 or other DWS-program-related work training-site agreements between DWS or its grantee/contractors and that work training provider/employer.

Notification. W-2 work training providers/employers must inform their regular employees of the right to file a grievance under this policy, and of the procedure for doing so. Such notification may take place through such methods as:

- A sign posted in the workplace.
- A notification form signed by new employees during the hiring/orientation process (supplemented by other measures to notify current employees).
- A notification slip periodically included with employee paychecks.
- Any other means mutually agreed upon by the work training provider/employer and the local W-2 agency and approved by the Area Administrator.

Standard language for all these methods of notification is attached to this Operations Memo as Appendix 2 (see below) and is also provided in DWD publication DWSW-13121-P. Work training providers/employers must inform the W-2 agency of the notification method being used.

ADDITIONAL PROVISIONS

- Employees may initiate a group complaint. In such a case, the complainants shall choose one individual to represent the interests of the group. A group complaint shall be so designated at the first step of the grievance procedure and signed by all employees who are parties to the complaint.
- A work training provider/employer against whom multiple complaints have been lodged may ask that the Job Center Complaint Coordinator (JCCC) or the W-2 Agency consolidate complaints. The JCCC or agency may consolidate complaints where a reasonable basis for consolidation exists.
- No work training provider/employer may retaliate against an employee, his or her representative, or any witness who participates in the grievance procedure, for initiating or participating in the grievance procedure.

REVISIONS TO OTHER DOCUMENTS

The Wisconsin Works (W-2) Manual and W-2 Work Training Site Agreement (form DES-10792) are also being revised where necessary to reflect specific requirements of the grievance policy and procedure, including the requirement that employees be notified of their right to file a complaint.

W-2 AGENCY ACTIONS NEEDED

In order to implement this policy, W-2 agencies must:

- Designate agency staff responsible for hearing displacement complaints or maintain agreements with another DWS grantee/contractor in the same locality for staff from the latter to hear such complaints.
- Ensure that work training providers/employers are informed, through work training site agreements, of the provisions of this grievance policy.

- In conjunction with work training site agreements, supply work training providers/employers with the notification language provided in Appendix 2, below, and
- confirm that work training providers/employers are notifying regular employees of this grievance policy using one of the notification methods listed above.
- Notify the DWS Area Administrator in writing whenever a work training provider/employer with which that W-2 agency has a work training site agreement is found to have violated the provisions of this displacement policy.

APPENDIX 1: Displacement Grievance Procedure. The following is the procedure to be followed for resolving displacement complaints under the displacement grievance policy outlined in this Operations Memo. (Note: This procedure is excerpted from, and can also be found in the *DWS Workforce Programs Guide, Part I: Administration of Workforce Programs Policy and Procedure Manual—Section III.S: Grievances and Appeals*):

When an employer or work-training provider acting under agreement with a DWS grantee/contractor is a respondent to complaints/grievances about the administration, implementation, and operation of DWS-funded employment and training programs, including complaints of unlawful employee displacement by a DWS program participant, the following procedures must be used:

- (1) The complainant shall file a written complaint/grievance within one year after the alleged violation took place.
- (2) The grantee or contracting agency shall review the complaint/grievance to determine if it was filed within the one-year time limit and if it falls within the jurisdiction of the DWD grantee/contractor and meets grievance/complaint criteria under WIA, WtW, or TANF/W-2. If the criteria are not met, the grantee shall provide the complainant with written notice of the rejection of the complaint/grievance and the reasons for that rejection. If the criteria are met, the grantee/contractor shall provide the complainant with written notice of the acceptance. The filing date shall be included in the notice.
- (3) After accepting the complaint/grievance, the DWS grantee/contractor shall contact the respondent, investigate the complaint, and attempt to reach an informal resolution.
- (4) If an informal resolution cannot be reached, the grantee/contractor shall:
 - (a) Conduct a hearing within 30 calendar days of the filing date.
 - (b) Issue a decision to both the complainant and respondent within 60 calendar days of the filing date.
- (5) Format for written decision.
 - (a) Summary Statement that identifies issue(s) being contested and which caused the hearing to be called. Include citation of law(s), rule(s), regulation(s) policy(ies) and agreements alleged to have been violated.
 - (b) Findings of Facts which enumerates items the hearing examiner accepts as facts based upon demonstration of support (documentation) from complainant's and respondent's presentation of facts and opinions.
 - (c) Conclusion is brief summary of the facts which affirm or deny assertions made by parties at the hearing.
 - (d) Decision should be based on the conclusion(s) and provide a remedy for final resolution.
 - (e) Appeal rights must be included in the written decision. This statement of appeal rights shall include how, where and how much time the aggrieved party has to appeal the decision.

- (6) After receiving an adverse decision or no decision on a complaint/grievance within thirty calendar days, either the complainant or the respondent (or both) may file an appeal requesting a state-level independent review. This appeal must be filed with DWS within the following time limitations:
- (a) The complainant and/or respondent must file the appeal within 10 calendar days after they received the decision; or
 - (b) If the complainant and/or respondent did not receive a decision, they must file the appeal within 15 calendar days after the decision was due.
- (7) After accepting a complaint/grievance that has been appealed from the grantee/contractor level requesting a state level review, the DWS administrator, on behalf of the Governor, shall review the case and issue a final decision within 30 calendar days after the appeal was filed.
- (8) Appeal. A complaint alleging that DWS on behalf of the Governor has not issued a decision within 60 days after a complaint is filed or the party to such decision receives an adverse decision may appeal these issues to the Secretary of Labor if federal regulations governing the program in question so provide. The Secretary shall make a final determination no later than 120 days after receiving such an appeal.

APPENDIX 2: Notification Language. The following language is for use in notices to regular employees of a W-2 work training provider/employer regarding the displacement grievance policy described in this Operations Memo:

This business is proud to be a work training provider/employer for one or more federal or state workforce programs. As a work training provider/employer this business helps participants gain job skills and work experience that will help them succeed in the workforce.

As a work training provider/employer this business cannot:

- terminate a regular employee or otherwise reduce its workforce for the purpose of placing an individual in a federally subsidized employment position;
- fill a position with a federally subsidized workforce program participant when any other person is on layoff or strike from the same or a substantially equivalent job within the same organizational unit;
- fill a position with a federally subsidized workforce program participant when any other person is engaged in a labor dispute regarding the same or a substantially equivalent job within the same organizational unit.

As a regular employee of this business, you have the right to file a complaint if you believe your employer has engaged in one of these practices.

For further information, including information about how to file a complaint, contact your local Job Center Complaint Coordinator at:

[Insert contact information for nearest JCCC here]

Questions regarding this memo should be directed to your regional office.

CONTACTS

BHCE CARES Information & Problem Resolution Center

Email: carpolcc@dhfs.state.wi.us
Telephone: (608) 261-6317 (Option #1)
Fax: (608) 267-2269

Note: Email contacts are preferred. Thank you.

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC – Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Wisconsin Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BDS/FB